

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
DOCKET NO. 3:15-cv-00214-FDW-DSC

PGI POLYMER, INC.,)
)
Plaintiff/Counterclaim Defendant,)
)
v.)
)
CHURCH & DWIGHT CO., INC., <i>et al.</i> ,)
)
Defendants/Counterclaimants.)
)

**PLAINTIFF'S REPLY TO DEFENDANTS'
COUNTER-PROPOSED PRELIMINARY INJUNCTION**

Pursuant to the Court's order of October 5, 2015 (Document No. 54), Plaintiff submits the following Reply to Defendants' Counter-Proposed Preliminary Injunction.

FORMAT OF REPLY

In its October 5 order, the Court emphasized that Plaintiff should "limit discussion in its Proposed Order to the Preliminary Injunction factors, and to which of Defendants' proposed revisions it consents." In accordance with these instructions, Plaintiff has prepared two documents. The first is a redline document, which Plaintiff submits in order to fulfill the Court's instructions to note "disagreements with Defendants' proposed revisions" and to identify "to which of Defendants' proposed revisions it consents." Plaintiff prepared this redline document in three steps: (1) it incorporated all of Defendants' language from their proposed preliminary injunction, and highlighted in green the proposed insertions to which it consents; (2) it struck through all language to which it objects; and (3) it identified its objections in comments to the document.

The second document is a clean copy of the proposed preliminary injunction order in which the language to which Plaintiff objects is deleted. Both the redline document and the clean

copy are being filed as exhibits to this Reply, and Plaintiff also will submit both documents as RTF files through the CM/ECF Cyber Clerk.

Respectfully Submitted,

Dated: October 7, 2015

s/ Jason M. Sneed

Jason M. Sneed, Esq. (NC Bar No. 29593)
Sarah C. Hsia, Esq. (admitted *pro hac vice*)
SNEED PLLC
610 Jetton St., Suite 120-107
Davidson, North Carolina 28036
Tel.: 844-763-3347
Email: JSneed@SneedLegal.com
Sarah @SneedLegal.com

Attorneys for Plaintiff PGI Polymer, Inc.

CERTIFICATE OF SERVICE AND WORD-LIMIT COMPLIANCE

I hereby certify that on October 7, 2015, I electronically filed the foregoing *Plaintiff's Reply to Defendants' Counter-Proposed Preliminary Injunction* with the Clerk of Court using the CM/ECF system. Service of the same on Defendants will be accomplished through the Notice of Electronic Filing, in accordance with LCvR 5.3.

s/ Jason M. Sneed

Jason M. Sneed, Esq. (NC Bar No. 29593)

SNEED PLLC

610 Jetton St., Suite 120-107

Davidson, North Carolina 28036

Tel.: 844-763-3347

Email: JSneed@SneedLegal.com

Attorney for Plaintiff PGI Polymer, Inc.